

Tony Ellis

May 23, 2003



By Hand Delivery

Document Processing Center (7407)
Office of Pollution, Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460
Attention: Section 8(e) Coordinator

Re: **TSCA Section 8(e) Submissions**

Dear Sir/Madam:

3M Company ("3M") requests that EPA place the attached studies in the TSCA Section 8(e) docket. We have included an index for these studies identifying the study title, test substance and CAS number. A CBI version of this index and the studies also is being submitted today pursuant to EPA procedures.

3M has concluded that data in these studies may not be, strictly speaking, "corroborative" of previously reported or published information as defined in EPA's reporting guidance or otherwise potentially may warrant 8(e) submission based on EPA's reporting guidance.

3M appreciates EPA's attention to this matter. Please contact the undersigned if you have any questions or require further information regarding this submission.

Very truly yours,

Dr. Katherine E. Reed (924)

Dr. Katherine E. Reed, Ph.D
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SUBMISSION BY 3M COMPANY ON MAY 23, 2003

Study Title	Test Substance	CAS Number
Exploratory 28-Day Oral Toxicity Study with T-7250, T-7251, T-7252, T-7253, T-7254, and T-7255 by Daily Gavage in the Rat Followed by a 14/28-Day Recovery Period (NOTOX Project 264656)	Separate studies for each chemical: [CBI removed]; Hexanesulfonamide, 1,1,2,2,3,3,4,4,5,5,6,6,6 - Tridecafluoro-n-(2-Hydroxyethyl)-N-Methyl - 100%; 1-Butanesulfonamide, 1,1,2,2,3,3,4,4,4-Nonafluoro-N-(2-Hydroxyethyl)-N-Methyl - 100%	[CBI removed]; 68555-75-9; 34454-97-2
Exploratory 28-Day Oral Toxicity Study with T-7125, T-7126, T-7127, T-7128, and T-7129 by Daily Gavage in the Rat Followed by a 14/28-Day Recovery Period (NOTOX Project 256679)	Cyclohexanesulfonic acid, decafluoro(pentafluoromethyl)-, potassium salt (CAS No. 67584-42-3) - 66-70%; Cyclohexanesulfonic acid, decafluoro(trifluoromethyl)-, potassium salt (CAS No. 68156-07-0) - 18-22%; Cyclohexanesulfonic acid, nonafluorobis(trifluoromethyl)-, potassium salt (CAS No. 68156-01-4) - 9-13%; Cyclohexanesulfonic acid, undecafluoro-, potassium salt (CAS No. 3107-18-4) - 1-3%	67584-42-3; 68156-07-0; 68156-01-4; 3107-18-4
Subchronic 90-Day Oral Toxicity with T-6524 by Daily Gavage in the Rat Followed by a 28-Day Recovery Period	65% Sulfonamides, C4-8-alkane, perfluoro, N-(3-(dimethyloxidoamino)propyl), potassium CAS#179005-06-2; 20% Amine oxide C8F17SO2NH(->O)CH2CH2CH2N(CH3)2; 15% C3-C7 K-salts of amine oxides CNF2N+1SO2N-)(+K)(->O)CH2CH2CH2N(CH3)2	179005-06-2
A Study for Effects on Embryofoetal Development of the Rat (Inhalation Administration)	[CBI removed]	[CBI removed]
Evaluation of the Ability of T-5870 to Induce Chromosome Aberrations in Cultured Peripheral Human Lymphocytes (with Independent Repeat)	2-ethoxy ethyl acrylate	106-74-1
Chromosomal Aberration Test of T-6695 Using Cultured Mammalian Cells	[CBI removed]	[CBI removed]
Acute Oral Toxicity Study in Rats (Exp. No. 920584) (Test Article: Intermedio 1249)	2-methyl-2-butanone-(4-sulfonamidophenyl)-hydrazone; Molecular Formula: C11H17N3O2S	Unknown
Acute Oral Toxicity Study in Rats (Exp. No. 930321) (Test Article: 501149)	3H-pyrazol-3-one, 2-(4-aminophenyl), 4-dihydro-5-(1-pyrrolidinyl)	30707-77-8
Skin Corrosivity Study of T-5799 in Rabbits (DOT/UN Regulations)	1-Octanesulfonyl Fluoride - 87.5%, Other Alkyl Sulfonyl Fluorides and Acidic Impurities - 11%, Water - 5.4%, Octanesulfonyl Chloride - 1.4%	40630-63-5; Unknown; 7732-18-5; 7795-95-1
Skin Corrosivity Study of T-5800 in Rabbits (DOT/UN Regulations)	1-Octanesulfonyl Fluoride - 87.5%, Other Alkyl Sulfonyl Fluorides and Acidic Impurities - 11%, Water - 5.4%, Octanesulfonyl Chloride - 1.4%	40630-63-5; Unknown; 7732-18-5; 7795-95-1
Primary Dermal Irritation/Corrosion Study of T-5635 in Rabbits (OECD Guidelines)	[CBI removed]	[CBI removed]
Primary Dermal Irritation/Corrosion Study of T-5897 in Rabbits (OECD Guidelines)	Isophthaloylbis (2-methylarziridine) - 97%, Toluene - 2%, Xylene - 0.5%.	7652-64-4; 108-88-3; 1330-20-7
Skin Corrosivity Study of T-7030.1 in Rabbits (with Protocol TP4206 attached)	[CBI removed]	[CBI removed]
Dermal Sensitization Study of T-5474 in Guinea Pigs - Maximization Test (EPA Guidelines)	Water (CAS No. 7732-18-5) - 68.4%; Dodecylbenzenesulfonic Acid (CAS No. 27176-87-0) - 17.5%; Polymethacrylate (CAS No. 25087-26-7) - 11.76%; Sodium Hydroxide (CAS No. 1310-73-2) - 2.3%; Unknown - 0.040%	7732-18-5; 27176-87-0; 25087-26-7; 1310-73-2

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Study Title	Test Substance	CAS Number
Dermal Sensitization Study of T-5894 in Guinea Pigs - Maximization Test (EC Guidelines) (with Protocol TP6164E attached)	[CBI removed]	[CBI removed]
Dermal Sensitization Study of T-6006 in Guinea Pigs - Closed Patch Technique (EPA Guidelines)	Dimethyltetradecylamine Oxide - 55%, Oleamidopropyl dimethylamine - 18%, 1-Methoxy -2- Propanol - 5%, Citronellol - 5%, Polyethylene Glycol - < 3%, Alpha - (Carboxymethyl) - Omega - (Dodecyloxy) Poly (Oxyethylene) Sodium Salt - ~3%, Trialkyl Amine Oxide - 2%, Isopropyl Alcohol - 2%, Fragrance Sozio SZ 5467 - 2%, Water - 1%, Acetic Acid - 1%, Miscellaneous ingredients at less than 1%	3332-27-2; 109-28-4; 107-98-2; 106-22-9; 25322-68-3; 33939-64-9; 7128-91-8; 67-63-0; Unknown; 7732-18-5; 64- 19-7
Dermal Sensitization Study of T-7280 in Guinea Pigs - Closed Patch Technique (with Protocol TP2008 attached)	[CBI removed]	[CBI removed]
Acute Oral Toxicity Study of T-6735 in Rats (OECD Guidelines) (with Protocol TP2069 attached)	4,6-dibromo-2-isopropyl phenol	Unknown
Acute Toxicity to Daphnia Magna	[CBI removed]	[CBI removed]
Evaluation of the Mutagenic Activity of T-5870 in an In Vitro Mammalian Cell Gene Mutation Test with L5178Y Mouse Lymphoma Cells (with Independent Repeat)	2-ethoxy ethyl acrylate	106-74-1
Acute Eye Irritation Study in New Zealand White Rabbits (Exp. No. 920364) (Test Article: 586442-50055)	HP=Benzo[thiazolium (9CI); SB=3-ethyl-2-((3-(3-(3-ethyl-2(3H)-benzothiazolylidene)-1-propenyl)-5,5-dimethyl-2-cyclohexen-1-ylidene)methyl)-6-methoxy-5-methyl-; NM=Iodide; Molecular Formula: C32H37N2OS2.I	87699-86-3
Acute Eye Irritation Study in New Zealand White Rabbits (Exp. No. 940151) (Test Article: 580066)	Thiazolium, 3-ethyl-2-[3-(3-ethyl-2-thiazolidinylidene)-1-propenyl]-4,5-dihydro-, iodide; Molecular Formula: C13H21N2S2.I	3065-71-2
Acute Eye Irritation Study in New Zealand White Rabbits (Exp. No. 930529) (Test Article: 1268)	3-ethoxy-carbonyl-methyl-4-etoxy-methylidene-rhodanine; Molecular Formula: C10H13NO4S2	Unknown
Acute Eye Irritation Study in New Zealand White Rabbits (Exp. No. 920582) (Test Article: 1248)	C6H10ClN3O2S	Unknown
One Generation Reproduction Study of PFOS - Mevalonic Acid/Cholesterol Challenge and NOEL Investigation in Rats	Perfluorooctane Sulfonic Acid Potassium Salt	2795-39-3
Augmented acute (4-hour) inhalation toxicity study with T-6905 in rats	2% solids of fluorochemical fatty acid ester in water	306974-63-0